



**United States
Department of
Agriculture**

Food and
Nutrition
Service

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March 25, 2003

SUBJECT: Final WIC Policy Memorandum: #2003-04
Allowable Costs of Bioterrorism Preparedness

TO: Regional Directors
Supplemental Food Programs
All Regions

This policy memorandum provides clarification regarding the use of WIC Program funds and resources to support bioterrorism preparedness.

Background

In 2002, the Administration launched two important initiatives to prepare the nation for a possible biological disaster. The first initiative is the National Smallpox Vaccination Program (NSVP). The goal of this initiative is "to increase the nation's smallpox preparedness capacity by: 1) offering vaccinations safely to volunteer public health teams (including vaccinators) to conduct investigations and outbreak control for the initial cases of a smallpox event; and 2) offering vaccinations safely to key volunteer healthcare workers who would treat and manage the initial smallpox cases and suspects." Funding for the planning and implementation of this initiative has been provided through the Public Health Preparedness and Response for Bioterrorism (PHPRB) Cooperative Agreement (Source: Centers for Disease Control and Prevention (CDC) Supplementary Guidance for Planning and Implementing the NSVP).

The second initiative is the establishment of comprehensive Bioterrorism Response Plans in all fifty states and U.S. territories. These plans include the assessment of available resources within each state to respond to a biological disaster and the establishment of Biological Disaster Response Teams. To fund these initiatives, the CDC has provided nearly \$1 billion in grants for bioterrorism preparedness to all States, U.S. territories and protectorates, and several major cities, including Washington, DC, Chicago, Los Angeles, and New York City. Additional funding for ongoing activities will be provided.

Impact on WIC Program

In response to a natural disaster, the affected WIC State agency assesses the disaster's impact on program operations and participants to determine whether to implement a Disaster WIC Program in accordance with its disaster plan. The response to a biological disaster, however, will be coordinated at a higher level than the program level and be focused on identification and containment of the outbreak. Consequently, current State agency disaster plans for natural disasters are inadequate

to address a biological disaster. Below are answers to questions that have arisen in this area.

Question 1: May WIC funds/employees be used to implement the National Smallpox Vaccination Program?

Answer: Although WIC employees may be used to implement the NSVP, the WIC Program would need to be reimbursed for staff time spent on this initiative, because vaccinating health care workers and first responders is not an allowable cost under current laws and regulations governing the WIC Program. Before committing WIC staff to implement the NSVP, State and local agency directors should ensure that: 1) adequate staff remain available to provide WIC services to program participants; and 2) reimbursement will be provided for WIC staff time spent on the NSVP.

Question 2: May WIC funds/employees be used to staff State Biological Disaster Response Teams?

Answer: With the approval of the State agency director, WIC employees may volunteer to be part of their State's Biological Disaster Response Team. If other reimbursement is unavailable, staff time for participating in team activities, such as planning and training, would be an allowable cost for the WIC Program because the employees would gain knowledge and experience useful to assist the WIC Program in bioterrorism preparedness.

Question 3: May WIC resources be used in the event of an actual biological disaster?

Answer: In planning its response to a potential biological disaster, each State must consider the use of all available resources within its jurisdiction. Consequently, the State may, without regard to the allowability of costs to the WIC Program, incorporate the use of its WIC Program resources (i.e., staff, facilities, equipment, and supplies) into its biological disaster plan. This does **not** authorize the diversion of WIC funds to non-WIC accounts. In the event of an actual biological disaster, WIC Program resources will be brought to bear in accordance with States' biological disaster plans.

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